

FILED

December 1, 2021

SEALED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: SAJ Deputy

Case No: SA-21-CR-00531-JKP**UNITED STATES OF AMERICA****Plaintiff****v.**

- (1) TIMOTHY BLAND**
aka "GRANDMA"
- (2) CRANDALL JONES**
aka "PUNIE"
- (3) LUIS TOVIAS**
- (4) VALERIE NICHOLE GARCIA**
- (5) PAMELA FELITA BREEDING**
- (6) TIMOTHY ELVIN BREEDING**
aka "LITTLE TIM"
aka "LITTLE T"
aka "JUNIOR"
- (7) JOHN RUSSUP**
aka "PIZZA"
aka "PIZZA MAN"
- (8) MICHELLE KATHERINE BILSKEY**
aka "KAT"
- (9) TERRY LYNN CLAY**
- (10) TONYA VONCI MIDDLETON-
HARRIS**
- (11) DANA HARRINGTON**
- (12) LAMONDRAE IRVING**

Defendants**INDICTMENT**

COUNT 1: Vio: 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)/(B) and 846: Conspiracy to Possess With Intent to Distribute Methamphetamine

COUNT 2: Vio: 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B): Possession With Intent to Distribute 50 grams or more of Methamphetamine

COUNT 3: Vio: 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B): Possession With Intent to Distribute 50 grams or more of Methamphetamine

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 841(a)(1) & (b)(1)(A)/(B) and 846]

Beginning on or about January 12, 2021, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

- (1) TIMOTHY BLAND aka “GRANDMA”
- (2) CRANDALL JONES aka “PUNIE”
- (3) LUIS TOVIAS
- (4) VALERIE NICHOLE GARCIA
- (5) PAMELA FELITA BREEDING
- (6) TIMOTHY ELVIN BREEDING aka “LITTLE TIM” aka “LITTLE T” aka “JUNIOR”
- (7) JOHN RUSSUP aka “PIZZA” aka “PIZZA MAN”
- (8) MICHELLE KATHERINE BILSKEY aka “KAT”
- (9) TERRY LYNN CLAY
- (10) TONYA VONCI MIDDLETON-HARRIS
- (11) DANA HARRINGTON
- (12) LAMONDRAE IRVING

knowingly and intentionally conspired, combined, confederated and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved methamphetamine, a Schedule II Controlled Substance, contrary to Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B) and 846.

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant’s own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

| DEFENDANT | QUANTITY |
|----------------------------|--|
| Timothy Bland (1) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| Crandall Jones (2) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine; |
| Luis Tovias (3) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| Valerie Nichole Garcia (4) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |

| | |
|-----------------------------------|---|
| Pamela Felita Breeding (5) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| Timothy Elvin Breeding (6) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| John Russup (7) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| Michelle Katherine Bilskey (8) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| Terry Lynn Clay (9) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| Tonya Vonci Middleton-Harris (10) | 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| Dana Harrington (11) | 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine |
| Lamondrae Irving (12) | 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine |

COUNT TWO

[21 U.S.C. §§ 841(a)(1) & (b)(1)(B)]

That on or about January 12, 2021, in the Western District of Texas, Defendant,

(7) JOHN RUSSUP aka “PIZZA” aka “PIZZA MAN”

did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of a mixture or substance containing Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) & (b)(1)(B).

COUNT THREE

[21 U.S.C. §§ 841(a)(1) & (b)(1)(B)]

That on or about February 24, 2021, in the Western District of Texas, Defendants,

(7) JOHN RUSSUP aka "PIZZA" aka "PIZZA MAN"
(12) LAMONDRAE IRVING

did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 50 grams or more of a mixture or substance containing Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) & (b)(1)(B).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Drug Violations and Forfeiture Statutes

[Title 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A) and (b)(1)(B), subject to forfeiture pursuant to Title 21 U.S.C. § 853(a)(1) and (2)]

As a result of the criminal violations set forth in Count One through Three, the United States gives notice to the Defendants of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. § 853(a)(1) and (2), which states:

Title 21 U.S.C. § 853. Criminal forfeitures

(a) Property subject to criminal forfeitures.

Any person convicted of a violation of this subchapter or subchapter II punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law.--

(1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

(2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; . . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties:

Real Properties

1. Real Property located and situated at **3527 Tampa St., Houston, Harris County, Texas**, with all buildings, appurtenances, and improvements thereon and any and all surface and sub-surface rights, title, and interests, if any, and being more fully described as follows:


Lot 20, Block 1 of Terrace Oaks, an Addition in Harris County, Texas according to the map or plat thereof, recorded in Volume 25, Page 24 of the Map Records of Harris County, Texas.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
United States Attorney

By: _____


For SARAH ELLA SPEARS
Assistant United States Attorney